

**DECLARATION OF RICHARD C. VASQUEZ IN SUPPORT OF PLAINTIFF'S
MOTION TO EXCLUDE EXPERT OPINIONS OF DR. STANTON C. HONIG AND DR.
JOSEPH SERLETTI**

EXHIBIT: 3

K. Ravikant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KAMAL RAVIKANT,

Plaintiff(s), Civil Action No.
21-CV-04758

-against-

CHRISTINE H. ROHDE, JOSEPH P. ALUKAL, JARROD
BOUGE, COLUMBIA DOCTORS FACULTY PRACTICE GROUP
OF THE COLUMBIA UNIVERSITY IRVING MEDICAL
CENTER, THE NEW YORK AND PRESBYTERIAN
HOSPITAL, JENNIE ROVANO, COLUMBIA DOCTORS
MEDICAL GROUP,

Defendant(s).

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(VIA ZOOM)

November 8, 2022
11:14 a.m.

DEPOSITION of KAMAL RAVIKANT, the
Plaintiff, by the Defendants in the
above-entitled action, held at the above time
and place, pursuant to Order, taken before
SANDRA BRUZZESE, a shorthand reporter and
Notary Public within and for the State of New
York.



2

1 K. Ravikant
2 A P P E A R A N C E S:
3
4 VASQUEZ BENISEK & LINDGREN, LLP
Attorneys for Plaintiff(s)
5 1550 Parkside Drive, Suite 130
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6
7 BY: RICHARD VASQUEZ, ESQ.
-and-
8 ERIC BENISEK, ESQ.
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10 LEAV & STEINBERG, LLP
Local Attorneys for Plaintiff(s)
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11 New York, New York 10004
12 BY: (NOT PRESENT)
13
14 THE LAW OFFICE OF MARC ZIMMERMAN
Co-Counsel for Plaintiff(s)
2000 Crystal Springs Road
15 San Bruno, California 94066
16 BY: (NOT PRESENT)
17
18 AARONSON RAPPAPORT FEINSTEIN &
DEUTSCH, LLP
Attorneys for Defendant(s)
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New York, New York 10016
20
21 BY: NANOR BAHADURIAN, ESQ.
FILE NO. 150.637
NLTBAHADURIAN@ARFDLAW.COM
22
23
24
25 xxxxx

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1 K. Ravikant
2 S T I P U L A T I O N S
3
4 IT IS HEREBY STIPULATED AND AGREED by
5 and between the attorneys for the respective
6 parties herein, that filing, sealing and
7 certification, and the same are, hereby
8 waived.
9
10 IT IS FURTHER STIPULATED AND AGREED
11 that all objections except as to the form of
12 the question, shall be reserved to the time of
13 the trial.
14
15 IT IS FURTHER STIPULATED AND AGREED
16 that the within deposition may be signed and
17 sworn to by an officer authorized to
18 administer an oath, with the same force and
19 effect as if signed and sworn to before the
20 Court.
21
22 xxxxx
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4

1 K. Ravikant
2 THE COURT REPORTER: Before I swear
3 in the witness, I will ask Counsel to
4 stipulate on the record that I may
5 swear in the deponent even though I am
6 not in the physical presence of the
7 deponent, and that there is no
8 objection to that at this time, nor
9 will there be an objection to it at a
10 future date.
11 So stipulated, Counsel?
12 MR. VASQUEZ: So stipulated.
13 MS. BAHADURIAN: So stipulated.
14 THE COURT REPORTER: Thank you.
15 Mr. Vasquez, will you be ordering a
16 copy of your witness' transcript? If
17 you are, I would need your verbal
18 confirmation on the record.
19 MR. VASQUEZ: Yes, I will be.
20 THE COURT REPORTER: Thank you.
21 xxxxx
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5

1 K. Ravikant
2 K A M A L R A V I K A N T, the witness
3 herein, having been first duly sworn before
4 a Notary Public of the State of New York, was
5 examined and testified as follows:
6 EXAMINATION
7 BY MS. BAHADURIAN:
8 Q. Please state your name for the
9 record.
10 A. Kamal Ravikant.
11 Q. State your address for the record,
12 please.
13 A. 222 Karen Avenue, Apartment 3301,
14 Las Vegas, Nevada 89109.
15 Q. Good morning, Mr. Ravikant. My name
16 is Nanor Bahadurian. I'm from the law firm
17 of Aaronson, Rappaport, Feinstein and
18 Deutsch. We represent the defendants, Dr.
19 Christine Rohde, Dr. Joseph Alukal, Dr.
20 Jarrod Bogue, Nurse Jennie Rovano, The New
21 York and Presbyterian Hospital, and the
22 Trustees of Columbia University in this
23 action.
24 I'm going to be asking you a series
25 of questions today. Please listen to my



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1 K. Ravikant
 2 Q. How did you get there from the
 3 hospital?
 4 A. Uber.
 5 Q. Did anyone accompany you during that
 6 ride home?
 7 A. No.
 8 Q. Were you able to walk at all at the
 9 time you were discharged from the hospital?
 10 A. Yes. Very -- it was very -- I
 11 couldn't walk for the first two days. After
 12 that, we started having a nurse just take me
 13 for a brief walk up the hallway. I remember
 14 the victory of up and down the hallway daily.
 15 And then I remember the victory of a couple
 16 of days later, being able to turn around
 17 in the hallway. But it was always with a
 18 nurse holding me up.
 19 This one, when I left, I did walk to
 20 the elevator. I made it to the elevator, and
 21 I remember I was sweating and I was grabbing
 22 the back of those -- you know in elevators,
 23 they have those bars, like, and I remember
 24 grabbing those and pulling myself up. Yeah,
 25 so I was able to walk, and I walked out.

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1 K. Ravikant
 2 Q. Did any medical provider tell you
 3 that you should limit your activity in any
 4 way at the time of discharge?
 5 A. I remember speaking with Dr. Alukal
 6 about -- my whole thing was when will I
 7 recover, when will I recover? Because
 8 originally, the laparoscopic -- he had told
 9 me it would just take a few days and then I
 10 wanted to go to the gym. But he would not --
 11 he made my wait for two or three weeks.
 12 But this one, there was no -- repeat
 13 the question again, please? I'm sorry. I'm
 14 rambling.
 15 Q. Did any medical provider tell you
 16 there were any limitations on activity at the
 17 time of discharge?
 18 A. I think I had a nurse, the discharge
 19 nurse, read me a lot of stuff. She was
 20 taking out my IVs and stuff like that, and
 21 there were a hundred pages of forms to sign.
 22 Q. Do you recall signing any forms
 23 before the initial surgery with Dr. Alukal?
 24 A. Before, like, what day?
 25 Q. Before you underwent the October 1st

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1 K. Ravikant
 2 surgery.
 3 A. I remember having to sign some
 4 electronic forms when I showed up to the
 5 hospital that day, at reception. I remember
 6 -- I'm pretty sure I had to sign something
 7 for Dr. Rohde. Those are what I remember.
 8 Q. Do you recall what it is that you
 9 signed?
 10 A. No.
 11 Q. Do you recall the purpose of the
 12 documents you signed?
 13 MR. VASQUEZ: Objection. Vague.
 14 THE WITNESS: Do I understand --
 15 MR. VASQUEZ: If you understand the
 16 question.
 17 A. Say the question again.
 18 Q. Do you recall the purpose of the
 19 documents you signed?
 20 A. I recall the purpose being -- my
 21 assumption of the purpose being this is all
 22 consent, all the consent paperwork you sign
 23 to have surgery.
 24 Q. What do you understand consent
 25 paperwork to be?

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1 K. Ravikant
 2 A. I understand it to be the very same
 3 as the same consent paper -- the form I sign
 4 when I update my IOS on my iPhone. This is
 5 ever possibly thing that can -- for
 6 liability.
 7 Q. Do you recall every possible thing
 8 that was listed on the consent forms that you
 9 signed before the October 1st surgery with
 10 Dr. Alukal?
 11 MR. VASQUEZ: Objection to form.
 12 THE WITNESS: Do I answer?
 13 MR. VASQUEZ: If you understand the
 14 question.
 15 A. Repeat the question.
 16 Q. Do you recall every possible -- you
 17 compared those forms to the IOS form that you
 18 sign, and you said that both those forms
 19 contain every possible thing that could
 20 happen.
 21 Is that accurate?
 22 MR. VASQUEZ: Objection to form.
 23 A. That's an assumption I have, yes.
 24 Q. The assumption that the forms list
 25 every possible thing that could happen, what



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1 K. Ravikant
 2 do you recall was listed on the firms that
 3 you signed in advance of the October 1st
 4 surgery with Dr. Alukal as being possible
 5 things that could happen?
 6 A. I don't recall what was on the form.
 7 You can pull up the form if you want.
 8 Q. When you arrived home and you were
 9 able to walk, did you have anyone assisting
 10 you at home after your discharge?
 11 A. I had a nursing service come daily
 12 to check the bandages, to buy things for me
 13 from Walgreens, buy food for me. Pick up
 14 things for me. Change the bandages every
 15 day, I think, for, like, a week.
 16 Q. Do you recall what nursing service
 17 that was?
 18 A. No.
 19 Q. Did you hire them through the
 20 hospital, or somewhere else?
 21 A. Somewhere else.
 22 Q. Where else, if you know?
 23 A. I'm guessing I looked online.
 24 Q. After that one week, did you have
 25 anyone coming to your apartment to help you

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1 K. Ravikant
 2 out with day-to-day activities in any way?
 3 A. No.
 4 Q. Were you on any pain medications at
 5 the time you arrived home following your
 6 hospital admission?
 7 A. Yes.
 8 Q. What pain medications were you on at
 9 that time?
 10 A. I don't remember the name, but they
 11 were opioids, narcotics. Whatever they give
 12 you.
 13 Q. How long were you on the opioids or
 14 the narcotics?
 15 A. Significantly -- I mean, obviously
 16 in the hospital I was on IV and oral, like,
 17 every hour and a half, I believe. When I
 18 came home, I think I was on them for a couple
 19 of weeks, and then I kept some for a few
 20 occasions here and there.
 21 Q. When you came off of them, did you
 22 have any pain?
 23 A. A lot.
 24 Q. Why did you come off of the pain
 25 medications if you still had pain?

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1 K. Ravikant
 2 A. It's something Dr. Alukal and I also
 3 discussed. I think I did some -- I did a
 4 video, and I don't remember if it was during
 5 that time. It was. Because when I was on
 6 opioids, when I got back, I did a video that
 7 I posted on Instagram called "Kamal on
 8 narcotics" or "Kamal on opioids," where I
 9 talked about the experience. But I was
 10 full-on on opioids.
 11 And I'm using the term "opioids"
 12 because I don't remember if it was OxyContin
 13 or was it -- it was one of those. I just
 14 remember talking about the blood spraying
 15 when it burst and all of that, and I remember
 16 thinking it was a good idea at the time. And
 17 then a reader, a long-time reader of mine
 18 reached out to me and she was very upset, and
 19 she said this is disrespectful to people who
 20 have opioid addictions. And I remember
 21 reading that and thinking, oh, my God, what
 22 am I doing? I'm not thinking straight. She
 23 is so right. I would never in my right mind
 24 do this. I'm not thinking right on these
 25 things.

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1 K. Ravikant
 2 And two, at a certain point, what I
 3 discovered with these pain meds was that one
 4 of these things they do is they make you not
 5 care about the pain. Even if you feel it,
 6 you sort of stop caring about it. And I had
 7 stopped caring. And I was, like, oh, my God,
 8 this is why addiction happens. If you are
 9 going through anything horrible and you don't
 10 care -- and I could see my mind starting to
 11 like it, and I am not going to put myself
 12 into something worse than I already am. I
 13 immediately started tapering them off, no
 14 matter how -- and just dealt with the pain.
 15 I used ice for pain instead. A lot of ice.
 16 Q. Did you find that the ice relieved
 17 your pain?
 18 A. It helped a lot.
 19 Q. Did you --
 20 A. I had big bags of ice. I'm sorry.
 21 Q. Keep going.
 22 A. It was constant rotation of big bags
 23 of ice around my scrotum.
 24 Q. You mentioned you traveled twice in
 25 2019. When was that?



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1 K. Ravikant
2 first one, and I believe that was at night.
3 It felt like night.
4 Q. Did she talk to you at all about the
5 second surgery, or only the first?
6 A. Only the first. The sense I got was
7 she was present for the first. She was doing
8 rounds. She was the urology resident.
9 And I remember Dr. Rohde coming once
10 I was up on my actual floor in my actual
11 room, coming with a lot of residents. And I
12 remember a lot of residents coming and going
13 back and forth.
14 The question is, did any of them
15 speak to me about the second surgery?
16 Q. Yes, but if you have information
17 about the first surgery, as well, I --
18 A. Okay. I remember Dr. Bogue. He was
19 -- he described it -- because he was part of
20 -- he was Dr. Rohde's chief resident, I
21 believe. And no one described to me in
22 detail, I believe, what happened. Also, keep
23 in mind I was on severe pain medication, IV
24 and oral, for those first few days,
25 especially. So I know doctors came and saw

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1 K. Ravikant
2 me. Dr. Rohde came at least once or twice.
3 I remember a lot of residents came and I
4 remember Dr. Alukal. But I don't remember
5 people telling me about the second surgery.
6 Q. Did you ever learn what was done
7 during the second surgery?
8 A. Yes. I remember having that
9 knowledge when I was in the hospital.
10 Q. Do you remember how you obtained
11 that knowledge?
12 A. I don't remember.
13 Q. What knowledge did you have about
14 the second surgery while you were at New York
15 Presbyterian?
16 A. That they had stopped the bleeding
17 and then -- and taken the artery and hooked
18 it up to the main vein in the penis.
19 Q. Where was the artery from, if you
20 know?
21 A. It was the same artery that was
22 taken from the original surgery.
23 Q. Did you ever find out why Dr. Rohde
24 was pointing to the calf before the second
25 surgery?

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1 K. Ravikant
2 A. I found out after. Not before.
3 Q. She was pointing to the calf before
4 the surgery; right?
5 A. She was gesturing towards it, and I
6 remember thinking, why are you gesturing to
7 my calf?
8 Q. Did you ever find out why?
9 A. Yes.
10 Q. What did you find out?
11 A. This is after I woke up from the
12 second surgery; correct?
13 Q. Yes. Whenever you found out.
14 A. They took a vein and grafted it onto
15 -- they basically made a connection between
16 the vein in the penis and then the original
17 artery from my abdomen, and that was --
18 that's what they took the vein for.
19 Q. Where did they take the vein from,
20 for the graft?
21 A. My left calf.
22 MS. BAHADURIAN: Off the record.
23 (Whereupon, a discussion was
24 held off the record.)
25 MS. BAHADURIAN: We are meeting

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1 K. Ravikant
2 tomorrow at 8:00 a.m. Pacific standard
3 time, and proceeding with a full day
4 tomorrow.
5 (Time noted: 7:23 p.m.)
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1 K. Ravikant
 2 ACKNOWLEDGMENT
 3 I, KAMAL RAVIKANT, hereby certify that I
 4 have read the transcript of my testimony taken
 5 under oath on November 8th, 2022, that the
 6 transcript is a true, complete and correct
 7 record of what was asked, answered and said
 8 during my testimony under oath, and that the
 9 answers on the record as given by me are true
 10 and correct.
 11
 12
 13
 14 _____
 15 KAMAL RAVIKANT
 16
 17 Signed and subscribed to
 18 before me, this ____ day
 19 of _____, _____.
 20
 21 _____
 22 Notary Public
 23
 24
 25


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1 K. Ravikant
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1 K. Ravikant
 2 CERTIFICATE
 3 I, SANDRA BRUZZESE, a shorthand
 4 reporter and Notary Public within and for the
 5 State of New York, do hereby certify:
 6 That the witness(es) whose testimony
 7 is hereinbefore set forth was duly sworn by
 8 me, and the foregoing transcript is a true
 9 record of the testimony given by such
 10 witness(es).
 11 I further certify that I am not
 12 related to any of the parties to this action
 13 by blood or marriage, and that I am in no way
 14 interested in the outcome of this matter.
 15
 16
 17  
 18 SANDRA BRUZZESE
 19
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1 K. Ravikant
 2 CERTIFICATE
 3 I, MARCI GLOTZER, a shorthand reporter
 4 and Notary Public within and for the State of
 5 New York, do hereby certify:
 6 That the witness(es) whose testimony
 7 is hereinbefore set forth was duly sworn by
 8 me, and the foregoing transcript is a true
 9 record of the testimony given by such
 10 witness(es).
 11 I further certify that I am not
 12 related to any of the parties to this action
 13 by blood or marriage, and that I am in no way
 14 interested in the outcome of this matter.
 15
 16 
 17
 18 MARCI GLOTZER
 19
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